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*Attorneys for Plaintiff Megan E. Klatt
and all others similarly situated*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MEGAN E. KLATT, an individual, on behalf
of herself and all others similarly situated;

Plaintiff,

v.

DIGNITY HEALTH, a California
corporation; DOES 1-50, unknown
individuals; and ROE COMPANIES 1-50,
unknown business entities,

Defendants.

Case No. 2:17-cv-02425-RFB-PAL

**STIPULATION AND ORDER TO
AMEND BRIEFING
SCHEDULE ON MOTION FOR
PROTECTIVE ORDER**

(Second Request)

Megan Klatt, Plaintiff, and Dignity Health, Defendant (collectively, the “Parties”), by and through their respective counsel, previously stipulated and agreed that by end of day June 22, 2018, they would provide the Court with the status of efforts to resolve issues first identified in Defendant’s Motion for Protective Order (ECF No. 40) (“Defendant’s Motion”), which arise from Plaintiff’s 30(b)(6) Deposition Notice. The Parties subsequently requested a two week extension of time to provide the Court information on these efforts. (ECF No. 50). The Parties filed a Stipulation to Set Briefing Schedule on the Motion for Protective Order (ECF No. 51) on June 22, 2018. The Court has not yet ruled on the submitted Stipulation.

1 The Parties are still working diligently to resolve all their differences; however, not all issues
2 raised in Defendant's Motion have been resolved. Hence, the Parties request the Court enter the
3 following briefing schedule for purposes:

- 4 1. Plaintiff's Opposition to Defendant's Motion shall be filed by or before July 9, 2018;
- 5 2. Defendant's Reply in Support of Defendant's Motion shall be filed by or before July
6 23, 2018; and,
- 7 3. The Court set a hearing to consider the unresolved issues presented in Defendant's
8 Motion as soon as practicable.

9 This stipulation is submitted in good faith and not for the purpose of delay.

10 Dated this 5th day of July 2018.

11 SEMENZA KIRCHER RICKARD

12 /s/ Lawrence J. Semenza, III, Esq.

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17 Las Vegas, Nevada 89145

18 *Attorneys for Plaintiff Megan E. Klatt*
19 *and all others similarly situated*

20 Dated this 5th day of July 2018.

21 JACKSON LEWIS P.C.

22 /s/ Kirsten A. Milton, Esq.

23 Elayna J. Youchah, Esq., Bar No. 5837
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26 Las Vegas, Nevada 89169

27 *Attorneys for Defendant Dignity Health*
28

ORDER

IT IS HEREBY ORDERED THAT, the briefing schedule and the Court's consideration of Defendant, Dignity Health's Motion for Protective Order (ECF No. 40) be as follows:

1. Plaintiff's Opposition to Defendant's Motion shall be filed by or before July 9, 2018;
2. Defendant's Reply in Support of Defendant's Motion shall be filed by or July 23, 2018; and,
3. The Court shall hear oral argument on unresolved issues presented in Defendant's Motion for Protective Order on the 14th day of August, 2018, at 11:00 am.
4. The Second Stipulation (ECF No. 52) is **GRANTED**.
5. The First Stipulation (ECF No. 51) is **DENIED** as moot.

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: July 10, 2018